Applicant respectfully requests reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks.

Claims 1, 3-8, 10, 12-15, 17-22, and 24-41 are pending in the application, with claims 1, 10, 17, 20, 22, 26, 31, and 37 being independent. Claims 2, 11, and 23 were previously canceled, and claims 9 and 16 are canceled herein without prejudice to or disclaimer of the subject matter recited therein. Claims 1, 3-6, 8, 10, 12-15, 22, and 24 are amended herein. Support for the claim amendments and additions can be found in the original disclosure. No new matter has been added.

§ 103 REJECTIONS

Claims 1, 3-5, 7-10, 12, 13, 15, 16, 22, 24-25, and 41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2004/0133855 ("Blair") in view of W3Schools.com ("CSS Pseduo-Classes"). Claims 6 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over "Blair" in view of ordinary skill in the art. Applicant respectfully traverses the rejections, and further requests that the rejections be reconsidered and withdrawn for at least the reasons that follow. Nevertheless, without conceding the propriety of the rejection and in the interest of expediting allowance of the application, claim 1 has been amended as proposed during the interview and is believed to be allowable.

Independent claim 1, as presently presented, is directed to "A method of compiling formatted video content into a binary format", and recites:

> A method of compiling formatted video content into a binary format comprising:
>
>   processing a formatted video content with a process that is specific to the format of the video content and a process that is specific to a predetermined client, the formatted video content including: Cascading Style Sheets (CSS) that select an element of the formatted video content by a pseudo-class, and
>
>   *a localization dictionary to translate one or more textual words of the formatted video content into a plurality of languages.* (Emphasis added).

Blair is directed to providing a presentation engine adapted for use by a constrained resource client device. More specifically, Blair pertains to the conversion of information streams by a near side server into feature or function reduced information streams and/or data files that are subsequently propagated to a client. (Blair, paragraph 0016). However, Blair fails to disclose or suggest "a localization dictionary to translate one or more textual words of the formatted video content into a plurality of languages," as presently recited in independent claim 1.

Claim 1 has been amended to include, in part, the limitations of previous dependent claim 8. The Office recites with reference to formerly presented dependent claim 8:

> Blair does not explicitly the contents of the web pages that it processes. Official Notice is given that web pages at the time of the invention commonly contained translated words. Therefore, it would have been obvious to one of ordinary skill in the art at the time of the invention to use Blair to process web pages with translated word because it would have been desirable to make Blair able to process commonly occurring web pages. (Office Action, page 5, lines 12-16)

Applicant agrees with the Office that Blair does not explicitly disclose or suggest the contents of the web pages that it processes; however, Applicant respectfully traverses the assertion that a localization dictionary is inherent in Blair.

Blair fails to disclose a "localization dictionary" and further fails to disclose or suggest translating text to another language. Furthermore, a localization dictionary, or some similar component, is necessary to perform the functions as recited in claim 1 and thus is not inherent subject matter. Since Blair fails to make a specific reference to such subject matter, Blair fails to disclose or suggest the above cited recitations of claim 1.

CSS Pseudo-Classes was cited for its alleged teaching of "CSS that select an element by pseudo-class (whole document)" (Office Action, page 3, lines 14-15). However, CSS Pseudo-Classes fails to remedy the deficiencies in Blair noted above with respect to claim 1. For example, CSS Pseudo-Classes fails to disclose or suggest "a localization dictionary to translate one or more textual words of the formatted video content into a plurality of languages," as presently recited in claim 1.

Claim 1 is supported by the specification on at least pages 8 and 9 paragraph [0023] and by element 104 in Figure 1. Accordingly, as discussed during the interview, independent claim 1 is believed allowable.

Dependent claims 3-5, 7-9, and 41 depend from independent claim 1 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Dependent claim **6** depends from independent claim 1 and is allowable by virtue

of this dependency, as well as for additional features that it recites. Applicant also

respectfully requests individual consideration of dependent claim 6.

Independent claim **10**, as presently presented, is directed to "A computer storage

medium", and recites:

> A computer storage medium storing instructions that when
> executed cause one or more processors to:
> capture a presentation result of processed video content, the
> video content includes *a localization dictionary to translate one or
> more textual words of the video content into a plurality of languages,*
> wherein the presentation includes layout, rendering, UI interaction,
> and dynamic aspects of the video content, and wherein the capture
> comprises processing the video content with a routine that is specific
> to the format of the video content and a client-specific routine specific
> to a predetermined client; and
> create one or more serialized binary bit streams
> corresponding to the presentation result, wherein the serialized binary
> bit streams facilitates visual rendering and end user interaction with
> the serialized binary bit streams through a user interface. (Emphasis
> added)

Blair either singly or in view of the cited art fails to disclose or suggest "a localization

dictionary to translate one or more textual words of the video content into a plurality of

languages" as presently recited in independent claim 10.

Applicant incorporates similar reasoning as presented above in response to the

rejection of claim 1. Specifically, Blair fails to disclose translation a "localization

dictionary" and further fails to disclose or suggest translating text to another language.

Furthermore, a localization dictionary is not inherent in subject matter as disclosed in Blair. Accordingly independent claim 10 is believed allowable.

Dependent claims 12-13, and 15 depend from independent claim 10 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

Dependent claim 14 depends from independent claim 10 and is allowable by virtue of its dependency, as well as for additional features that it recites. Applicant also respectfully requests individual consideration of dependent claim 14.

Independent claim 22, as presently presented, is directed to "A Multiple System Operation system", and recites:

> A Multiple System Operation system, comprising:
> storage for video content in an original markup language that includes layout, rendering, UI interaction, and dynamic aspects of the video content,
> wherein the video content includes *a localization dictionary to translate one or more textual words of the video content into a plurality of languages*; and
> one or more headends each having one or more servers,
> wherein each said server includes a compiler to compile the video content in the original markup language into video content in a binary format that includes the layout, rendering, UI interaction, and dynamic aspects of the video content from the original markup language,
> wherein the compiler facilitates processing the video content in the original markup language with a markup-specific routine that is specific to the original markup language, and a client-specific routine specific to a predetermined client for rendering the video content in the binary format so as to be consistent with the original markup language. (Emphasis added).

Blair either singly or in view of the cited art fails to disclose or suggest "a localization dictionary to translate one or more textual words of the video content into a plurality of languages" as presently recited in independent claim 22.

Applicant incorporates similar reasoning as presented above in response to the rejection of claim 1. Specifically, Blair fails to disclose translation a "localization dictionary" and further fails to disclose or suggest translating text to another language. Accordingly independent claim 22 is believed allowable.

Dependent claims 24-25 depend from independent claim 22 and are allowable by virtue of this dependency, as well as for additional features that they recite. Applicant also respectfully requests individual consideration of each dependent claim.

CONCLUSION

For at least the foregoing reasons, claims 1, 3-8, 10, 12-15, 17-22, and 24-41 are in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the rejections and an early notice of allowance.

The arguments and amendments presented herein were necessitated by the most recent Office Action, and could not have been presented previously because Applicant earnestly believed that the claims were in condition for allowance at the time of filing the previous response.
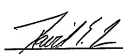
If any issue remains unresolved that would prevent allowance of this case, Applicant requests that the Examiner contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Lee & Hayes, PLLC

Dated: _August 22, 2008_   By: _____

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